

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KEITH WALKER,
Plaintiff,

v.

ADMINISTRATOR OF THE ESTATE OF
FORMER CHICAGO POLICE
DEPARTMENT COMMANDER JON
BURGE, *et al.*,
Defendants.

Case No. 21 C 4231

Judge Sunil R. Harjani

Magistrate Judge Gabriel A. Fuentes

**PLAINTIFF'S UNOPPOSED FIRST MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANT CITY OF CHICAGO'S RENEWED MOTION
TO BIFURCATE §1983 CLAIMS AND STAY DISCOVERY AND TRIAL ON
THOSE CLAIMS**

Plaintiff, KEITH WALKER, by and through his attorneys, PERL & GOODSNYDER, LTD., moves for a 21-day extension of time, to October 14, 2025, to file his response to Defendant City of Chicago's Renewed Motion to Bifurcate §1983 Claims and Stay Discovery and Trial on Those Claims. In support of this unopposed motion, Plaintiff states as follows:

1. Defendant City of Chicago has filed its Renewed Motion to Bifurcate §1983 Claims and Stay Discovery and Trial on Those Claims. Dkt. 412.
2. Plaintiff's response to Defendant's Renewed Motion to Bifurcate is due by September 23, 2025. Dkt. 413.
3. Due to the undersigned counsel's caseload and other work obligations, as well as negotiations with Defendant on this issue, Plaintiff requests until October 14, 2025, to respond to Defendant's Renewed Motion to Bifurcate.

4. Defendants do not oppose this motion, and this Motion is not brought for purposes of undue delay. No prejudice will result to any party by the granting of this Motion.

WHEREFORE, for the reasons set forth above, Plaintiff respectfully requests that this Court grant him a 21-day extension of time, until October 14, 2025, to respond to Defendants' Joint Opposed Motion for a Rule 35 Examination of Plaintiff and Defendant City of Chicago's Renewed Motion to Bifurcate §1983 Claims and Stay Discovery and Trial on Those Claims

Dated: September 22, 2025.

Respectfully submitted on behalf of the:

Plaintiff, **KEITH WALKER**,

By and through his attorneys:

PERL & GOODSNYDER, LTD.

By: Allen R. Perl

Mr. Allen R. Perl

One of Plaintiff's Attorneys

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